

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

MANATRON, INC. dba THOMSON
REUTERS TAX & ACCOUNTING,
GOVERNMENT,

Plaintiff,

v.

SNOHOMISH COUNTY, COWLITZ
COUNTY, and TYLER TECHNOLOGIES

Defendants.

NO. 2:17-cv-00959

**[PROPOSED] ORDER ON
PLAINTIFF’S MOTION FOR
TEMPORARY RESTRAINING
ORDER**

Under Local Civil Rules 7(d)(1) and 65, Plaintiff Manatron, Inc. dba Thomson Reuters Tax & Accounting (“TRTA”) moves the Court to issue an Order temporarily restraining Defendants Snohomish County and Cowlitz County (“Counties”) from disclosing and/or making public TRTA’s Responses to Snohomish County RFP #21-16SB and Cowlitz County RFP #05-2016, which contain vital TRTA trade secrets and other copyrighted intellectual property (“Protected Information”), which the Counties intend to disclose on June 22 and June 30, 2017 if not enjoined. The threatened disclosure comes in response to a request for records from a TRTA competitor, Tyler Technologies, Inc. (“Tyler”) under the Washington State Public Records Act (“PRA”), RCW 42.56, *et seq.*

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TEMPORARY RESTRAINING ORDER - 1

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1 The Court has reviewed the Complaint, TRO Motion, the Declaration of Jane Pope, and
 2 all other applicable materials, and is convinced that a TRO is appropriate here to preserve the
 3 *status quo ante*, at least until a preliminary injunction hearing can be scheduled and argued on
 4 the record. There is no convincing reason why the Counties should be allowed to disclose
 5 TRTA's copyrighted, Protected Information to a competitor without a hearing to explore
 6 whether TRTA's Protected Information is protected from disclosure under federal or
 7 Washington State law. In balancing the potential hardship between the parties there appears to
 8 be no immediate need for such disclosure to Tyler, whereas TRTA would suffer almost certain
 9 irreparable harm from disclosure of its trade secrets. **THE MOTION FOR A TRO IS**
 10 **THEREFORE GRANTED.**

11 NOW, THEREFORE, it is hereby **ORDERED, ADJUDGED, AND DECREED** that
 12 Defendants Snohomish and Cowlitz Counties, and any agents, employees, directors, or other
 13 persons acting on Defendants' behalf or in concert with them, shall be and are hereby
 14 immediately enjoined and barred from producing, disclosing, or releasing TRTA's Responses
 15 to Snohomish County RFP #21-16SB and Cowlitz County RFP #05-2016, until further Order
 16 from this Court. Defendant Counties are hereby directed to notify the PRA requester of the
 17 pendency of this action and of the issuance of this Order. The Court will set a date for a
 18 preliminary injunction hearing after hearing from all parties.

19 TRTA is **ORDERED** to post a bond in the amount of _____ no later than
 20 _____, 2017 into the Registry of Court. These funds may be paid either
 21 by check or credit card by TRTA.

22 Dated: _____

23 _____
 24 The Honorable Judge _____